



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Solvay Fluorides, LLC – Alorton Plant, Cahokia Heights, Illinois

FROM: Charles Hall, Environmental Engineer
AECAB (MN-OH)

THRU: Brian Dickens, Section Chief
AECAB (MN-OH)

TO: File, Solvay Fluorides, LLC – Alorton Plant, Cahokia Heights, Illinois

BASIC INFORMATION

Facility Name: Solvay Fluorides, LLC – Alorton Plant, Cahokia Heights, Illinois

Facility Location: 3500 Missouri Avenue, Cahokia Heights, Illinois

Date of Inspection: 14 September 2022

EPA Inspectors:

1. Charles Hall, U.S. EPA, Region 5, ECAD, AECAB, MN-OH Section
2. Natalia Vazquez, U.S. EPA, Region 5, ECAD, AECAB, MI-WI Section

Other Attendees:

1. Javier Hernandez, Plant Manager
2. Julie Nguyen, Health, Safety, and Environmental Manager
3. Chase Aspden, Plant Engineer¹
4. Pascual Camacho, Production Manager²
5. Marcy Dzielinski, North America HSE Liaison
6. Brian Hayes, Site Services³
7. Mark Lightle, Production Supervisor
8. Kim Shuster, North America Process Safety & Transportation Safety Manager
9. Cory Tiefenauer, Site Union President
10. Dale Wardall, Maintenance Manager⁴
11. Jason Wernle, Engineering and Quality Assurance Manager

¹ Opening discussion only.

² Camacho, Dzielinski, Lightle, Shuster, Tiefenauer, and Wernle attended the opening and closing discussions only. Dzielinski and Shuster joined by videoconference.

³ Hayes joined the inspection for the training section of the staff interview.

⁴ Wardall joined the inspection for the maintenance section of the staff interview.

Contact Email Address: julie.nguyen@solvay.com

Purpose of Inspection: CAA 112(r) inspection

Facility Type: manufacturer and distributor of fluoride chemicals

Regulations Central to Inspection: 40 C.F.R. Part 68

Arrival Time: 0800 hrs CDT

Departure Time: 1320 hrs CDT

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided because Solvay Fluorides is not a Small Business.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from the facility representatives.

Company Ownership: The ownership of the facility has not changed in the last 5 years.

Process Description: Solvay receives Anhydrous Hydrogen Fluoride (AHF) in railcars and transfers AHF to one of three dedicated AHF storage Tanks. Solvay mixes AHF with water to make hydrofluoric acid. Solvay receives Anhydrous Ammonia (AA) as a refrigerated liquid under pressure and stores it in an ammonia bullet.

Staff Interview: The staff interview used the RMP Program Level 3 Process Checklist as an outline for the staff interview.

TOUR INFORMATION

EPA Tour of the Facility: Yes.

Data Collected and Observations: The RMP Program Level 3 Process Checklist (Appendix B) summarizes the observations of whether Solvay has the required documents in its Risk Management Plan.

Photos were taken during the inspection.

Field Measurements were not taken during the inspection.

RECORDS REVIEW

Before the inspection, the inspectors requested the following documents:

1. Management structure in terms of RMP and who has responsibility for the different program elements and how that is documented;
2. Off-site Consequence Analysis supporting documentation;
3. Process Safety Information;
4. Process Hazard Analysis;
5. Operating Procedures specific to the covered process;
6. Lockout/Tagout procedures;
7. Training documentation on employees who operate and maintain the covered process;
8. Mechanical Integrity program procedures;
9. Management of Change written procedures;
10. Pre-Startup Safety Reviews completed in the covered process areas;
11. Compliance Audits, the two most recent audits, audit reports, findings of the audits, and how these findings have been resolved or corrected. (if applicable);
12. Incident Investigations performed for each of the covered processes, reports from the investigations, documentation on how the report findings and recommendations were addressed and resolved;
13. Employee participation plan of action regarding the implementation of the employee participation;
14. Hot work permit program/policy, examples of active permits issued for the processes;
15. Contractor policy, a list of contractors who have worked on or near the covered processes within the past two years, documentation on the safety performance and programs evaluated when selecting a contractor, work practices that control the entrance/exit or presence of contractors, documentation on how applicable provisions of the emergency response program are explained to contractors; and
16. Emergency Response Plan or Emergency Action Plan.

During the inspection, the inspectors requested, and Solvay produced, example training records for five employees.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents: The inspectors requested training records for five employees as examples for the production staff.

Compliance Assistance: The inspectors did not provide compliance assistance.

Concerns: The inspectors did not identify any deficiencies or concerns.

DIGITAL SIGNATURES

Report Author:

Section Chief:

APPENDICES AND ATTACHMENTS

A. Digital Image Log

B. RMP Program 3 Checklist

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Date of Inspection: September 14, 2022

APPENDIX A: DIGITAL IMAGE LOG

Photographer: Charles Hall Camera: Olympus Tough TG-6 EPA Bar Code: SZ4061


Image Number	File Name	Date and Time	Description of Image
1	P9130033.jpg	09/14/2022 11:35 CST	Anhydrous hydrogen fluoride unloading.
			
2	P9130034.jpg	09/14/2022 11:39 CST	Hydrofluoric acid storage (horizontal tanks) and truck loading
			

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Image Number	File Name	Date and Time	Description of Image
3	P9130035.jpg	09/14/2022 11:55 CST	65-ton ammonia storage bullet



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APPENDIX B: RMP PROGRAM 3 CHECKLIST